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NO.80-2166

IN THE SUPREME COURT OF THE UNITED STATES
October Term, 1980

MARY TABEROFF,

Petitioner,

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,

Intervenor Respondent

v.

FARMERS GROUP, INC., and

FARMERS INSURANCE GROUP,

Respondents.

Petition for Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit.

PETITIONER'S SECOND SUPPLEMENTAL REPLY BRIEF.

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(Jackson v. Bergland,D.C.D.C.1978,448 F. Supp.1146.)

APPENDIX

Respondent's exhibit A-61.....1-A-1, 1A-2

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144 (A Psalm) of David. 7

"Stretch forth Thy hands from on high;
Rescue me, and deliver me out of many waters,
Out of the hand of strangers;
8 Whose mouth speaketh falsehood,
And their right hand is a right hand of lying."

I plead with the Supreme Court not to ignore all my ten questions in the original Petition. Please give me some help. I have the faith of "JOB"; his faith carried him seven years; mine is over eleven years.

42 - 2000e-5 Note 291, Public Health and Welfare 1985-2010 Supp. Phamphlet 1974-1980- Page 739: VERBATIM:

> Charge which concerned various acts of interference, coercion and reprisal by supervisory officials of the Agricultural Research Service of the United States Department of Agriculture where the plaintiff was employed as a technician and which was made in connection with the filing and processing of a discriminatory employment complaint with the Commission was established by clear weight of credible evidence showing that, shortly following plaintiff's position appeal to the Commission and continuing after his discrimination complaint, plaintiff was effectively isolated from his previous work assignments by his supervisor, was denied an opportunity of working on projects for which he had responsibility, and for greater part was removed from significant laboratory activities and was generally assigned to routine tasks on a random basis. Jackson v. Bergland, D. C.D.C.1978, 448 F.Supp. 1146.

Respondents, "FARMERS" did the same to Mary Taberoff, Petitioner.

On September 5, 1981 I received from the United States Court of Appeals For The Ninth Circuit, xerox copies of the "SEALED EXHIBITS" that Respondents had filed with the U. S. District Court, Los Angeles and with the U.S.Appeals Court. There were several that were not in my Personnel file, several had been altered and it is a clear indication that these derogatory filings, ALL BY MALE EMPLOYEES to besmirch the name

of Mary Taberoff, Petitioner. She suffered the same treatment as in the "Jackson v. Bergland," case. Their own documentation, if a good psychiatrist were to review each downgrading note about Mary Taberoff, would recognize the same pattern used against her from the time she requested the promotion to job of Security Analyst until the time she was dismissed. One week pay "in lieu" of notice, refused to give me my three week vacation pay and still further harrassed me by sending three supervisors, Mr. Rudy, Mr. Bock, and Mr. Woo plus Mr. Wechsler, Attorney to the Unemployment office to lie and deny me my unemployment insurance. The Labor Board gave Mary Taberoff the decision in her favor for her vacation pay. Respondents refused to pay it. Labor Board directed Mary Taberoff to go to "Small Claims Court". She won her decision."Farmers" appealed. Mary won her case in "Superior Court". "SHE HAD EARNED THIS MONEY AND THEY COULD NOT TAKE IT AWAY FROM HER". (EMPHASIS).

EXHIBIT OK-17 Decision by Cecil Rupprecht , Deputy Labor Commissioner, CASE #75727-M (1972) 1-11-80 U.S.Appeals Court(Same information filed in U.S.Dist. Ct.)

EXHIBIT X-14 July 7, 1979 to U.S.Appeals Court.(Same information as to U.S.Dist. Ct.) Case #76410, Small Claims Court, Los Angeles. 1972(September).

EXHIBIT OK-16: Superior Court Case#C43964, (March, 1973) Filed U.S.Court of Appeals 1-11-80 and also, filed U.S.Dist. Court(Various dates).

In the "Respondents Brief in Opposition" in the Appendix, Page 5 under b. they list twelve exhibits by MALE SUPERVISORS AND MALE EMPLOYEES who all helped throw mud at Mary Taberoff and made her look like a terrible person. (IN THE JARGON OF THE STREET, "THEY ALL GANGED UP ON HER") (JUST FOR EVIDENCE IN THIS CIVIL RIGHTS CASE) (EMPHASIS!). If you read one, you will have read them all.

Al Fulton was a salesman out of the Santa Ana Regional Office, California.

He had absolutely no Analytical experience in Investments of Bonds or Stocks. He was given a job in the Home Office Investment Department as a Bond Buyer or Bond Analyst. Mr. R. Rudy was training him.

Mary Taberoff should have been promoted to this job. Mornings, Al Fulton worked in the office, afternoons he attended classes, taking investment courses and related , I believe trying to get a degree. However, since Mary Taberoff was familiar with all this Bond work, having done percentage reports on maturities for a twenty year based period per their buying schedule, Al Fulton would turn this work over to Mary Taberoff when he left for school to do all the percentage breakdown for him so that it would be ready for him in his training as a Bond Buyer. I believe he was paid a salary on a full time basis. This letter he wrote to downgrade me is a dirty, filthy distortion and falsehood. Larry Woo was a Cash Manager, my previous Supervisor.

I recall this purchase by Al Fulton, as if it happened yesterday because in a VERY PLEASANT QUIET WAY I tried to explain to Al Fulton that I thought he was misquoting the price. He resented my drawing this to his attention. I went back to my desk, however, it still bothered me to know that it was incorrect and I wanted to make sure that this was what he wanted me to type in the order, so I put a short note on his desk for him to see without getting into any verbal confrontation, and he confirmed that he was correct. I NEVER, NEVER APPROACHED HIM IN A LOUD VOICE NOR DID I EVER, EVER CALL TO HIM IN A LOUD VOICE. Apparrantly, he was embarrassed when he found out about the error. I, Mary Taberoff, would be willing to take an oath on a Bible, in Court that these males put their heads together and had Al Fulton prepare this note just to have another item in the file against Mary Taberoff. However, previous to September 5, 1981, I have never seen this note nor did I know that this was done because it was not in my personnel file when given to the attorneys.

For the purpose of Judicial Economy, after speaking with the Clerk of the Supreme Court and also, the Soliciter General's Assistant, I do not belive it necessary to remark about all the other exhibits. It would be cumbersome and repatitive.

In conclusion, I would be grateful if the Supreme Court would review the Transcript plus the various exhibits and excerpts that were filed in the court below, U. S. Court of Appeals for the Ninth Circuit. Thank you.

A-61 Exhibit number of Respondents, note of Al Fulton to Larry Woo, attached.

A61. 5 (1)

INTER-OFFICE CORRESPONDENCE

USE SEPARATE FORMSET FOR EACH POLICY OR CLAIM REFERENCE.

☐ FARMERS ☐ TRUCK ☐ FIRE ☐ MID-CENTURY ☐ FARMERS NEW WORLD LIFE ☐ TEXAS COUNTY MUTUAL ☐ PREMATIC

STATE _____ DIST. _____ AGENT _____ DATE December 3, 1971

TO:
Larry Woo

Al Fulton

FROM: _____
DEPT. & REGIONAL OFFICE OR AGENT'S NO.

INSURED _____

POLICY-OR TRUCK CL. NO. _____

PREMATIC ACC'T. NO. _____

LOSS DATE _____ GEN. FILES CODES _____

MASTER FILE NO. _____

APPENDIX

1-A-1

Personnel File - Mary Taberoff

On November 30, 1971, I purchased 5,000 shares of Cleveland Electric Illuminating Co., 7.40% Cum. Preferred Stock. I completed the Purchase Advices and delivered them to Mary.

As I handed them to her she began to quiz me in a loud voice to determine what errors she would find. Her approach is not one of helpfulness, rather an attempt to put you down.

The Advice stated 7.40% @ 7.40 net. This was intended to convey the fact that the stock was at Par. While I was on the phone she stuck a note under my nose and asked if the price was 7.40 - I said yes.

She then notified the Life Companies and the banks involved that the price of the stock was $7.40. When the first confirmation came in showing a price of $100 she called my name in a loud voice while I was talking to someone else on an important matter. She called my name 3 times, then ran over to talk to Bill Bock about the terrible mistake I made.

I feel that Mary's attitude is very poor in terms of teamwork and department cooperation. I have not reviewed the contents of this memo with Mary, since I am not her supervisor; however, I would be willing to discuss it with her in the presence of you and Dick Rudy.

APPENDIX

1-A-2

Al Fulton

AF:an

cc: Dick Rudy ✓

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P.O.BOX 272
Kempner, Texas 76539

Tel:(512)932-3129

DATE: September 11/81 Mary Taberoff
Mary Taberoff, Pro Se

CERTIFICATE OF SERVICE

I, Mary Taberoff, Pro Se, under the penalty of perjury, hereby testify that this, "PETITIONER'S SECOND SUPPLEMENTAL REPLY BRIEF" is true and correct to the best of my knowledge. On September 11,1981, I put respective copies in envelopes, sealed them and mailed first class from the Lampasas Post Office, Lampasas, Texas.

40 copies to Supreme Court, U.S.,Wash.D.C.

Three copies to: Jack M. Halgrem, Atty.
Gibson, Dunn & Crutcher of Counsel
2029 Century Park East
Los Angeles, Calif. 90067

Three copies to: Soliciter General
Department of Justice
RM 5614 Washington, D.C. 20530

Three copies to: Colleen O'Connor,App/Atty.
EEOC
2401 E. St. N.W.
Rm 2294 Washington, D.C.

DATE: September 11,1981 Mary Taberoff
MARY TABEROFF, PRO SE

SWORN TO AND SUBSCRIBED before this 11th day of September, 1981.

Frances Porter
Frances Porter
Notary Public in and for
Lampasas County, Texas

Commission expires 4-13-85